

1 GEORGE D. NIESPOLO (SBN 72107)
STEPHEN H. SUTRO (SBN 172168)
2 JENNIFER BRIGGS FISHER (SBN 241321)
DUANE MORRIS LLP
3 One Market, Spear Tower, Suite 2200
San Francisco, CA 94105-1104
4 Telephone: 415.957.3000
Facsimile: 415.957.3001
5 E-Mail: gdniespolo@duanemorris.com
shsutro@duanemorris.com
6 jbfisher@duanemorris.com

7 Attorneys for Defendants
NEC CORPORATION, NEC LCD TECHNOLOGIES,
8 LTD., NEC ELECTRONICS AMERICA, INC., NEC
CORPORATION OF AMERICA, INC., and NEC
9 DISPLAY SOLUTIONS OF AMERICA, INC.

10 [ADDITIONAL COUNSEL LISTED ON SIGNATURE PAGE]

11
12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

14 IN RE TFT-LCD (FLAT PANEL) ANTITRUST
15 LITIGATION

Case No.: M 07-1827 SI
MDL No. 1827

Case No. 3:11-cv-03342 SI

16
17 This Document Relates to Individual Case No. 3:11-
cv-03342 SI

**STIPULATION AND [PROPOSED]
ORDER EXTENDING HEARING ON
NEC'S MOTION TO DISMISS
ELECTROGRAPH'S COMPLAINT**

18 ELECTROGRAPH SYSTEMS, INC., et al.,

19 Plaintiffs,

20 vs.

21 NEC CORPORATION, et al.,

22 Defendants.
23
24
25
26
27
28

1 Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies Corp. and Defendants
 2 NEC Corporation, NEC Corporation of America, NEC Display Solutions of America, Inc., NEC
 3 Electronics America, Inc., and NEC LCD Technologies, Ltd., through their undersigned counsel,
 4 request that the Court enter the following order to extend the hearing date on the Motion to
 5 Dismiss to January 13, 2012.

6 WHEREAS Defendants filed a motion to dismiss the complaint in this action on
 7 September 6, 2011 (the "Motion");

8 WHEREAS Plaintiffs filed its opposition to the Motion on September 27, 2011;

9 WHEREAS Defendants filed a reply brief in support of their Motion on October 18, 2011;

10 WHEREAS the hearing on Defendants' Motion is currently set for November 18, 2011;

11 WHEREAS the parties agree that the date for the hearing on the Motion be extended to
 12 January 13, 2012, when similar motions in related cases will be heard by this Court.

13 THEREFORE, Plaintiffs, by their counsel, and Defendants, by the undersigned counsel,
 14 stipulate and agree that the Motion shall be heard on January 13, 2012.

15 **IT IS SO STIPULATED.**

16 DATED: November 14, 2011

/s/ William A. Isaacson

17 William A. Isaacson (admitted *pro hac vice*)
 18 BOIES, SCHILLER & FLEXNER LLP
 5301 Wisconsin Ave. NW, Suite 800
 Washington, D.C. 20015
 Telephone: (202) 237-2727
 Facsimile: (202) 237-6131
 Email: wisaacson@bsflp.com

21 Philip J. Iovieno (admitted *pro hac vice*)
 Anne M. Nardacci (admitted *pro hac vice*)
 Luke Nikas (admitted *pro hac vice*)
 Christopher V. Fenlon (admitted *pro hac vice*)
 22 BOIES, SCHILLER & FLEXNER LLP
 10 North Pearl Street, 4th Floor
 Albany, NY 12207
 Telephone: (518) 434-0600
 Facsimile: (518) 434-0665
 Email: piovieno@bsflp.com
 26 anardacci@bsflp.com
 lnikas@bsflp.com
 27 cfenlon@bsflp.com

Laura J. McKay (SBN 230049)
BOIES, SCHILLER & FLEXNER LLP
1999 Harrison Street, Suite 900
Oakland, CA 94612
Telephone: (510) 874-1000
Facsimile: (510) 874-1460
Email: lmckay@bsflp.com

*Counsel for Plaintiff Electrograph Systems, Inc. and
Electrograph Technologies Corp.*

/s/ George D. Niespolo
GEORGE D. NIESPOLO (SBN 72107)
STEPHEN H. SUTRO (SBN 172168)
JENNIFER BRIGGS FISHER (SBN 241321)
DUANE MORRIS LLP
One Market, Spear Tower, Suite 2200
San Francisco, CA 94105-1104
Telephone: 415.957.3000
Facsimile: 415.957.3001
E-Mail: gdniespolo@duanemorris.com
shsutro@duanemorris.com
jbfisher@duanemorris.com

*Attorneys for Defendants NEC CORPORATION,
NEC LCD TECHNOLOGIES, LTD.,
NEC ELECTRONICS AMERICA, INC.,
NEC CORPORATION OF AMERICA, INC., and
NEC DISPLAY SOLUTIONS OF AMERICA, INC.*

Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of
this document has been obtained from stipulating plaintiffs.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 11/15/11



Hon. Susan Y. Illston
United States District Judge